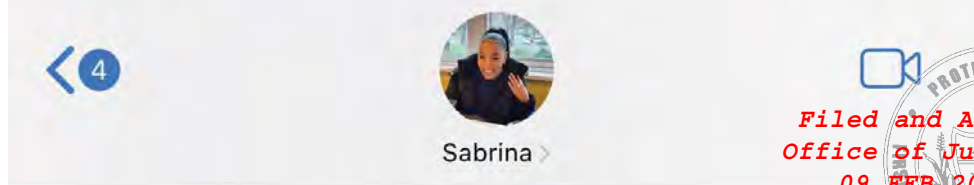


Tab 46-2



Filed and Attested by the
Office of Judicial Records
09 FEB 2024 02:26 pm
C. PERRY

Sat, Dec 17, 8:58 PM

Hey! How are you doing?

The adrenaline finally work off I think.
I'm so exhausted I'm gonna go to bed

But honestly not good

I'm really worried about chey and
also a little bit myself bc I flew off the
handle at him and I know that hit a
nerve for him

I am really still in shock. I'm so sorry
both you and chey had to go through
all that. I hope chey is okay because
that sounds so traumatizing and
having to work with him is really no
okay at this point. You know we have
your back and we are going to be
there for you no matter what.

Thank you so much girl you don't
even know how much it means to me
that you're so supportive

I hope chey gets herself some good
counseling

His last day is in 2 weeks but no way
are we letting him set foot in the firm

I'm worried he like sexually assaulted



iMessage



3:54



Sabrina >



I am really still in shock. I'm so sorry both you and chey had to go through all that. I hope chey is okay because that sounds so traumatizing and having to work with him is really no okay at this point. You know we have your back and we are going to be there for you no matter what.



Thank you so much girl you don't even know how much it means to me that you're so supportive

I hope chey gets herself some good counseling

His last day is in 2 weeks but no way are we letting him set foot in the firm

I'm worried he like sexually assaulted her I really hope she is able to talk to someone about what happened so that she doesn't hold it all in.

And then for him to basically threaten her with filing something against you is so wild

Me too. He was clearly trying to assault her in the bar

I wish I hadn't let her out of my sight



iMessage



3:35



Sabrina >



I wish I hadn't let her out of my sight

I know you do because you're an amazing friend but you did the best you could. No one could have predicted how crazy Edwin truly is.

Has Jesse been able to talk to chey and get her to talk to HR or her family?

Sun, Dec 18, 10:31 AM

Jesse and I both talked to her yesterday morning and she said she was going to talk to her parents before deciding anything



But I don't think there's a way around talking to HR tomorrow morning. I need to make sure I'm safe too, which means Edwin can't be allowed in the building for the next two weeks before he leaves

He's definitely mad at me for intervening and I don't feel safe with him around

Sun, Dec 18, 11:57 AM

1000% especially since it's gone way past the events that happened that night with now him threatening to file stuff against you. You gotta be safe



iMessage



3:35



Sabrina >



Sun, Dec 18, 11:57 AM

1000% especially since it's gone way past the events that happened that night with now him threatening to file stuff against you. You gotta be safe too

Yeah exactly and chey agrees with that too. I'm meeting with the head of the firm at 4 today to talk

Have you thought about what you are going to say?

Oh yea it's very complicated and depends a lot on what chey is willing to have out there

I'm talking to chey in a few hours about it

That's good so you guys will be on the same page just in case the head of the firm contacts Edwin. Who knows what he's capable of rn.

Sun, Dec 18, 7:25 PM

Do you still have Edwin on ig? If so can you watch his story real quick

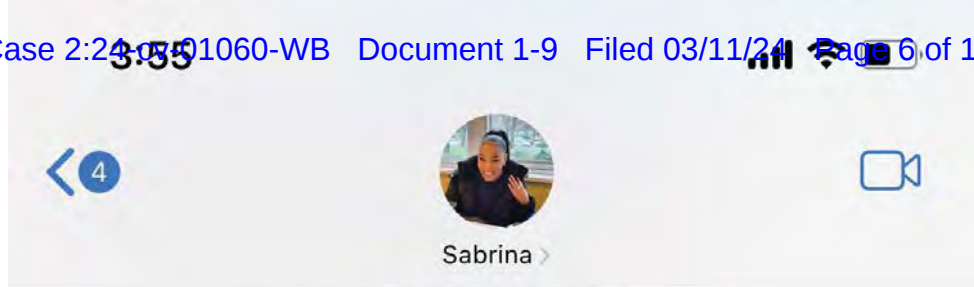
Let me double check

His story is Messi from the Argentina winning the World Cup



iMessage





Sun, Dec 18, 7:25 PM

Do you still have Edwin on ig? If so
can you watch his story real quick

Let me double check

His story is Messi from the Argentina
winning the World Cup

Thank you!

No problem! Did the head of the firm
call him?

Not yet but soon. They're still
working with IT on revoking all his
access and then they will call

How are you feeling?

Awful

Chey is sleeping here with me tonight

I'm worried about you. How is chey
doing?

She feels relieved she went to the
firm

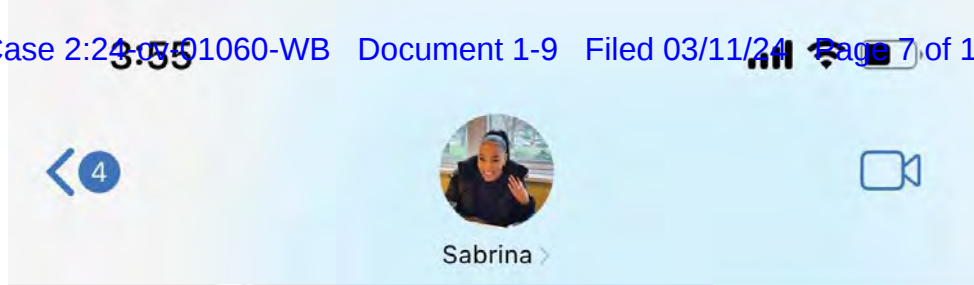
I'm worried he is gonna come for us

Mon, Dec 19, 5:04 PM



iMessage





Mon, Dec 19, 5:04 PM

I can't even imagine. I'm really still in shock. Has he been threatening her ?

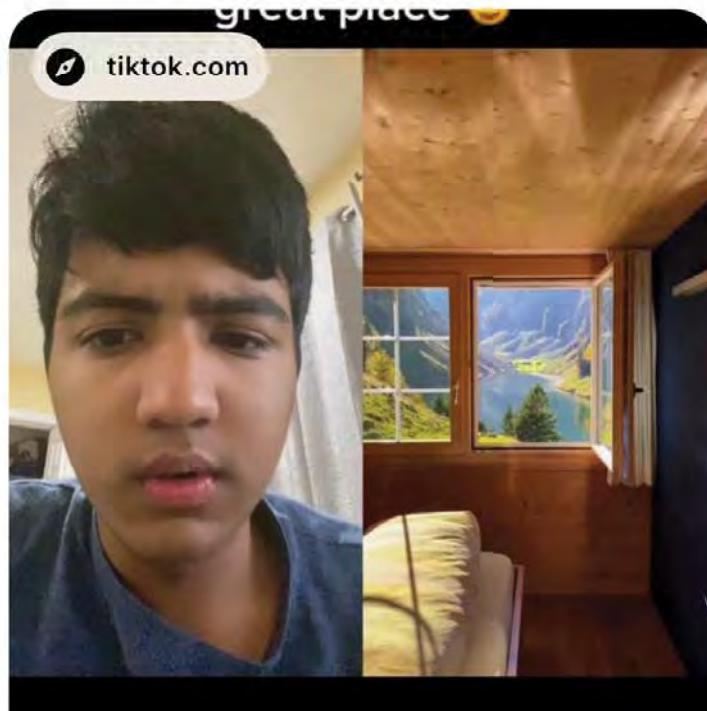
I can't talk about this over text anymore 😬

Okay I'll call you after I finish this notice of commencement. I'm so worried about you. This is scary

Let me call later tonight. I'm doing something right now!

Okayy sounds good!

Tue, Dec 20, 5:18 PM

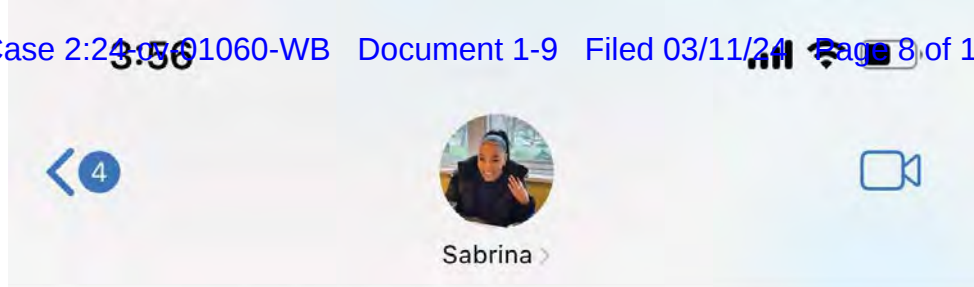


Oias Paudval on



iMessage





Thu, Dec 22, 4:08 PM

I don't wanna say much over text but I just want to say that I am very very sorry you and Alex are getting dragged through this at all. I know it's not fair to either of you. I also want to keep Alex far away from it

It's okay! I just love him so so much so I never want him involved in anything where neither him nor I know the details of or info, and serious things are happening. I'm just so protective over him. I really hope that this was just a one and done thing with Edwin because he's going to leave me no choice but to be like back off from Alex.

Idk I just feel like Alex should be off limits so I don't understand why message him out of the blue.

I agree Alex should be off limits. Has he message Alex back?

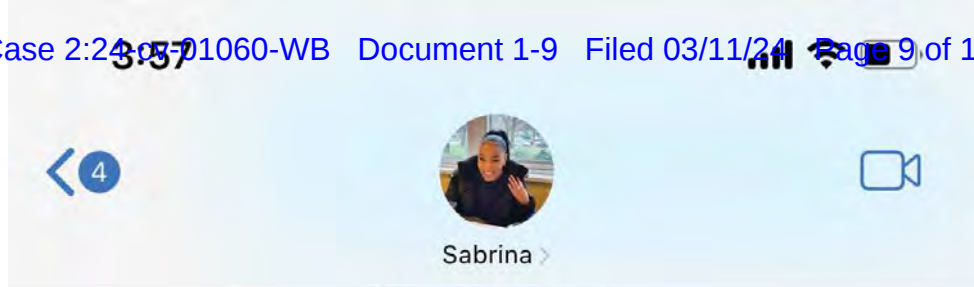
Not that I know of. I was just on the phone with him and Alex didn't say anything.

Okay good, hopefully he doesn't involve him at all



iMessage





Mon, Jan 2, 1:28 PM

Have you heard/seen anything about some kind of countdown on Edwin's story

He may have but I'm not sure because I usually don't look closely at stories of ppl I'm not close to.

Oh wow that's perfect timing for you though isn't it

Exactly which may be perfect for us so I'm excited

It'll depend on the kitchen tho because I can't tell the color

Like the color of the countertops??

Is it a 1 or 2 bed?

Im hoping it may be white with black but I can't tell if it's actually dark brown

Brown seems unlikely

White with black sounds pretty

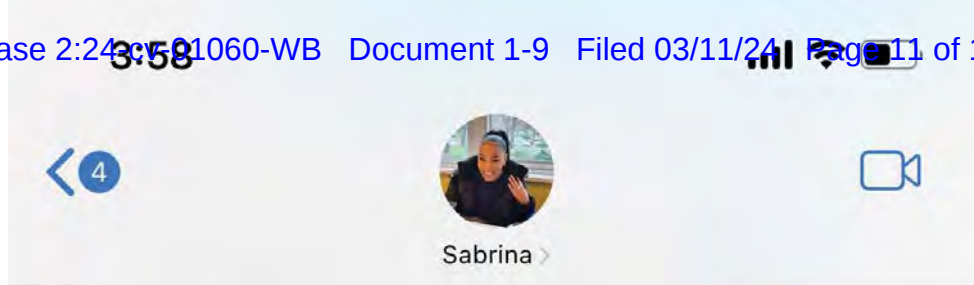
Can I call you real quick?



iMessage







Tue, Feb 14, 11:25 PM

Hey can I ask a favor

Hey yes what's up?

Can you and Alex please block Edwin from anything you have him? I really don't feel comfortable with him being able to have any kind of access to mine or Chey's life, even if it's very remote. And I also want Edwin (and Chey) to know that he does not have your support

I think he's taking the fact that you guys still follow him to mean that you don't know what's going on or don't have an opinion on it

Yea I will explain things to Alex and let him know

It means a lot to me thanks girl

Yea of course no problem! Alex is here so I will talk to him and let him know what's been happening.

Okie tell him whatever you feel is necessary, its probably easier if he understands why



iMessage



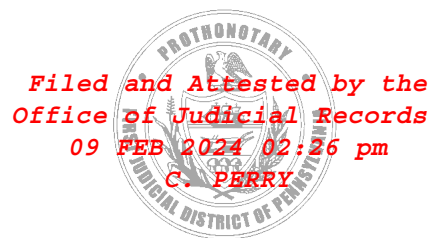
8:57



SE

NH

2 People >



Sat, Dec 17 at 1:48 PM

Nehama Hanoch

Hey y'all

Can you please let me know if Edwin reaches out to you at all? And if he does, do not answer him please

NH

Sabrina Espinal

Hey! Will do. I haven't heard from him in months

SE

Yes

Did he reach out to you?

Nehama Hanoch

Can I call you guys

NH

Yes

Sabrina Espinal

Yes

SE

Nehama Hanoch



FaceTime
Call Ended

NH

Sabrina Espinal



iMessage



ML&T
McMAHON, LENTZ & THOMPSON
ATTORNEYS AT LAW

Filed and Attested by the
Office of Judicial Records
09 FEB 2024 02:26 pm
C. PERRY

John I. McMahon, Jr.
Erin C. Lentz-McMahon
Brooks T. Thompson

John I. McMahon, Sr. (1959-2004)

June 29, 2023

Edwin Leon
622 Fulton Street
Conshohocken, PA 19428

Re: Edwin Leon / Criminal Investigation

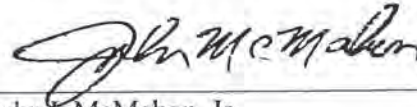
Dear Mr. Leon:

I am writing with respect to our representation of you relative to the Plymouth Township Police Department criminal investigation in which you were a prior subject, relating to allegations of sexual assault. Based on your oral interview to Detective Moretti and your passing the polygraph exam conducted by James McGowan, former Montgomery County Detective, this will confirm that I have been advised by law enforcement and the District Attorney's Office of Montgomery County that they have concluded their investigation and no charges will be filed against you.

Please let me know if you have any further questions.

Very truly yours,

McMAHON, LENTZ & THOMPSON



John I. McMahon, Jr.

JIMJR:lal

❑ 21 West Airy Street
Norristown, PA 19401
(610) 272-9502
Fax (610) 272-1036

❑ 711 West Avenue
Second Floor
Jenkintown, PA 19046
(800) 859-6262

Thu, Dec 29 at 18:42



No but it didn't go right to VM

Did you leave a VM ?

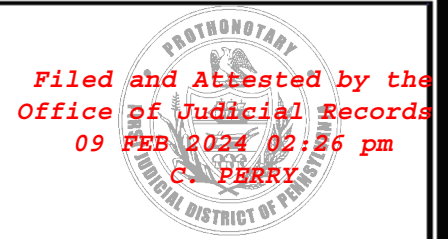
Fri, Dec 30 at 13:32

Hey I'll call you back as soon as I can — in a thing with my kids



iMessage





In the Matter Of:

CHEYENNE GOODMAN vs

EDWIN LEON

CHEYENNE GOODMAN

March 15, 2023



IN THE FAMILY COURT
OF THE STATE OF DELAWARE
IN AND FOR NEW CASTLE COUNTY

CHEYENNE GOODMAN,)
) File No.
Petitioner,) CN23-01005
) Petition No.
v.) 23-00029
)
EDWIN LEON,)
)
Respondent.)

Deposition of CHEYENNE GOODMAN
taken pursuant to notice at the law
offices of Bayard, P.A., 600 North King
Street, 4th Floor, Wilmington,
Delaware, beginning at 2:25 p.m. on
Wednesday, March 15, 2023, before Kurt
A. Fetzer, Registered Diplomate
Reporter and Notary Public.

LEXITAS REPORTING
Registered Professional Reporters
1330 King Street
Wilmington, Delaware 19801
(302) 655-0477
www.lexitaslegal.com

Cheyenne Goodman - March 15, 2023

2

1 APPEARANCES:

2 PATRICIA M. WEIR, ESQ.
3 THE YEARGER FIRM, LLC
4 2 Mill Road - Suite 105
5 Wilmington, Delaware 19806
6 For the Petitioner

7 KARA M. SWASEY, ESQ.
8 BAYARD, P.A.
9 600 North King Street - Suite 400
10 Wilmington, Delaware 19801
11 For the Respondent

12 ALSO PRESENT (REMOTELY):
13 EDWIN LEON

14 - - - - -
15
16
17
18
19
20
21
22
23
24

Cheyenne Goodman - March 15, 2023

3

1 CHEYENNE GOODMAN,
2 the deponent herein, having first
3 been duly sworn on oath, was
4 examined and testified as follows:

5 EXAMINATION

6 BY MS. SWASEY:

7 Q. Ms. Goodman, have you ever had
8 your deposition taken before?

9 A. No.

10 Q. If you don't understand a
11 question or you can't hear me, please
12 ask me repeat the question.

13 If you don't ask me to
14 repeat or clarify, I'm just going to
15 assume that you understood the question
16 and you heard it clearly.

17 Okay?

18 A. Okay.

19 Q. And all of your responses have
20 to be clear and verbal, so please don't
21 say uh-huh or shake your head. The
22 court reporter needs to capture the
23 responses.

24 Do you understand?

Cheyenne Goodman - March 15, 2023

4

1 A. Okay.

2 Q. Are you under the influence of
3 any drug or substance that would impact
4 your testimony?

5 A. No.

6 Q. Did you take any prescription
7 medicine today?

8 A. I did.

9 Q. What did you take today?

10 A. Zoloft.

11 Q. Do you have a prescription for
12 Xanax?

13 A. I have a prescription for a drug
14 that is like Xanax. I believe it's an
15 off-brand version.

16 Q. What's it's called?

17 A. Klonopin.

18 Q. Are you taking Klonopin today?

19 A. No.

20 Q. When is the last time you took
21 it?

22 A. Last night.

23 Q. And is that as prescribed?

24 A. Yes.

Cheyenne Goodman - March 15, 2023

5

1 Q. Do you take it once a day at
2 night?

3 A. Yeah.

4 Q. I'm going to jump right in and
5 ask you some questions about your
6 relationship with Mr. Leon.

7 When did you and Mr. Leon
8 meet?

9 A. It would have been when I
10 started as an intern at Young Conaway
11 sometime perhaps in January or February
12 of 2022.

13 Q. And how long did you and
14 Mr. Leon date?

15 A. We didn't.

16 Q. You didn't date. How would you
17 define your relationship?

18 A. From what time period?

19 Q. January 22 until today. It's
20 probably changed over the course of
21 time.

22 But can you describe how you
23 would define that relationship over the
24 course of time?

Cheyenne Goodman - March 15, 2023

6

1 A. Do you want me to break down
2 each course of time?

3 Q. Yes.

4 A. Okay. When I was an intern, so
5 that would be from January to I believe
6 the end of April, I barely knew him. I
7 had seen him in the course of working
8 at the same firm, but that was it.

9 Over the summer, in the
10 beginning of the summer we were
11 friends. We entered into a brief
12 perhaps couple months long -- sitting
13 here today I don't recall exactly how
14 long -- consensual sexual relationship.

15 From there on after I
16 wouldn't define anything that he did,
17 that we did together as a consensual
18 relationship.

19 Q. What period of time were you in
20 a brief consensual sexual relationship?

21 A. Sitting here today I don't
22 recall the exact dates. Perhaps July
23 to August.

24 Q. And when did your sexual

Cheyenne Goodman - March 15, 2023

7

1 relationship with Mr. Leon begin?

2 A. I don't recall.

3 Q. When did it end?

4 A. Consensually?

5 Q. Yes.

6 A. So to make sure I understand
7 your question, you're asking when was
8 the last time we had consensual sex?

9 Q. Yes.

10 A. I don't recall. I would posit
11 sometime around early fall.

12 Q. Did you have sex with my client
13 on Thanksgiving?

14 A. Yes.

15 Q. Did you have sex with my client
16 on December 7th?

17 A. I don't recall.

18 Q. Was the sex that you had with my
19 client on Thanksgiving non-consensual?

20 A. I suppose you will have to
21 define for me how you define non-
22 consensual.

23 Q. Well, you started, you used the
24 word consensual. Why don't you tell me

Cheyenne Goodman - March 15, 2023

8

1 how do you define consensual?

2 A. As being non-coercive, not under
3 any sort of threat, not under any sort
4 of fear.

5 Q. And tell me in November on
6 Thanksgiving when you had sex with my
7 client in what way was it not
8 consensual?

9 A. Edwin and I had had frequent
10 arguments that are documented about the
11 coercive and threatening ways he went
12 about a sexual relationship with me.
13 And that was true of our encounter on
14 Thanksgiving, although now I can't
15 recall if it was Thanksgiving or the
16 morning after.

17 Q. Did you spend the Thanksgiving
18 holiday with him?

19 A. No.

20 Q. Was this encounter at his house
21 or at your house or somewhere else?

22 A. His.

23 Q. Would you agree with me that
24 you did not include in your PFA a

Cheyenne Goodman - March 15, 2023

9

1 non-consensual sexual event on

2 Thanksgiving?

3 A. Yes.

4 Q. Are how many times between

5 August and early fall -- I guess

6 Thanksgiving is the last time you can

7 remember having sex with my client.

8 Did you have sex with my client between

9 August and Thanksgiving?

10 A. I couldn't say.

11 Q. Dozens of times?

12 A. I don't recall and I don't want

13 to guess.

14 Q. More than once?

15 A. Yes.

16 Q. More than twice?

17 A. Probably.

18 Q. More than three or four times?

19 A. I'm not sure.

20 Q. How often did you talk to

21 Mr. Leon on the phone in let's talk

22 about August until December?

23 A. Every day, multiple times a day.

24 Q. And who is calling whom?

Cheyenne Goodman - March 15, 2023

10

1 A. Typically he would call me in
2 the morning. He would call me again on
3 his way home from work. He would call
4 me before he went to bed.

5 I called him on several
6 occasions as well. I knew what was
7 expected of me.

8 Q. I'm sorry. When you say "I
9 called him on several occasions," were
10 you calling him daily?

11 A. I wouldn't say I called him
12 every day.

13 Q. Would you call him once a week?

14 A. Sure.

15 Q. Would it surprise you if the
16 phone records reflected that you were
17 calling him about as much as he was
18 calling you?

19 A. No.

20 Q. In addition to phone calls would
21 you also FaceTime one another?

22 A. Yes.

23 Q. Would you also use Snapchat?

24 A. Yes.

Cheyenne Goodman - March 15, 2023

11

1 Q. Text message?

2 A. Yes.

3 Q. Were there other ways that you
4 were communicating with one another?

5 A. I believe he sent me Instagram
6 posts.

7 Q. So direct message on Instagram?

8 A. Yes.

9 Q. Who knew about your relationship
10 with Mr. Leon before December 16th of
11 2022?

12 A. Can you explain to me how you're
13 defining "relationship"?

14 Q. However you define it. Who knew
15 about your consensual or non-consensual
16 sexual relationship with Mr. Leon
17 before December 16 of 2022?

18 A. My roommate Emalyn knew that I
19 had had sex with him at some point
20 during the summer.

21 Q. So only your roommate Emalyn?

22 A. Yes.

23 Q. And what about other friends at
24 work, did anybody know about your

Cheyenne Goodman - March 15, 2023

12

1 relationship, your sexual relationship
2 with Mr. Leon?

3 A. No.

4 Q. When is it that Emalyn came to
5 learn that you had sex with Mr. Leon?

6 A. At some point over the summer.

7 Q. And how did that happen?

8 A. I told her.

9 Q. You only told her about one
10 encounter?

11 A. I don't recall the extent of
12 what I told her.

13 Q. Did anyone ever confront you
14 with the suspicion about you having a
15 sexual relationship with Mr. Leon
16 before December 16th of 2022?

17 A. I can't answer that question
18 because it's privileged.

19 MS. SWASEY: Patty?

20 Q. Okay. So who asked you?

21 A. I had a brief conversation with
22 my mentor at work.

23 Q. Who is your mentor at work?

24 A. Chris Lambe.

Cheyenne Goodman - March 15, 2023

13

1 Q. When did that conversation take
2 place?

3 A. I believe September. I might be
4 wrong.

5 Q. Did you tell him that you were
6 having a consensual or non-consensual
7 sexual relationship with Mr. Leon?

8 A. I cannot answer the question
9 about the substance of our
10 conversation. It was in the course of
11 a work investigation and, as such,
12 privileged.

13 Q. There was a work investigation
14 going on in September of 2022?

15 A. Again, I cannot answer questions
16 about that.

17 MS. SWASEY: Can we go off
18 the record for a second?

19 (A discussion was held off
20 the record)

21 BY MS. SWASEY:

22 Q. Was Mr. Lambe representing you?

23 A. No.

24 Q. Were you talking to Mr. Lambe as

Cheyenne Goodman - March 15, 2023

14

1 a work mentor or as an attorney?

2 A. I was talking to Mr. Lambe as a
3 supervisor.

4 Q. Was it your understanding that
5 there was an investigation going on in
6 September?

7 A. It was my understanding that the
8 conversation depending on my decision
9 could or could not lead to an
10 investigation.

11 Q. What do you mean depending on
12 your decision?

13 A. If I wanted to move forward with
14 a complaint.

15 Q. Were you making a complaint
16 about Mr. Leon at the time?

17 A. No.

18 Q. Who initiated this conversation?

19 A. I did.

20 Q. What was the context of you
21 initiating that conversation?

22 A. I cannot answer that question.

23 MS. SWASEY: Patty, that's
24 not an investigation. If your client

Cheyenne Goodman - March 15, 2023

15

1 initiated a conversation with a
2 coworker or mentor --

3 A. The conversation --

4 MS. SWASEY: Hold on.
5 There's no question for you.

6 MS. WEIR: I'm sorry. Can
7 you finish what you were saying?

8 MS. SWASEY: Yes, that it's
9 not an investigation. If she initiated
10 a conversation with a coworker it's not
11 privileged and it's not an
12 investigation.

13 MS. WEIR: All right.

14 A. Would you like me to provide you
15 with the information?

16 Q. No. I would like you to answer
17 the question.

18 A. I can't answer a privileged
19 question. The conversation that led to
20 the possible investigation is
21 privileged because it came up during
22 the course of a work matter.

23 MS. SWASEY: Patty, that's
24 not a thing.

Cheyenne Goodman - March 15, 2023

16

1 Can we go off the record
2 again?

3 (A discussion was held off
4 the record)

5 MS. SWASEY: Back on the
6 record.

7 BY MS. SWASEY:

8 Q. So I'll ask you the question
9 again.

10 What did you say to Chris
11 Lambe in September of 2022 about your
12 sexual relationship with Mr. Leon?

13 A. I didn't.

14 Q. You didn't what?

15 A. I didn't say anything to him
16 about a sexual relationship.

17 Q. So your testimony was that you
18 initiated a conversation with Mr. Lambe
19 to talk about your relationship with
20 Mr. Leon?

21 A. No. Your question was that has
22 anybody ever asked me if there was a
23 sexual relationship. And I answered
24 yes.

Cheyenne Goodman - March 15, 2023

17

1 And you asked me who it was?
2 I answered Chris Lambe. We had this
3 issue about the course of the
4 conversation. And your new question is
5 what did I tell him? And I'm telling
6 you I did not tell him anything.

7 Q. So Mr. Lambe asked you if you
8 were having a sexual relationship with
9 Mr. Leon and you said no?

10 A. Yes.

11 Q. Was that a lie?

12 A. Yes.

13 Q. Why, if you know, did Mr. Lambe
14 ask you that question?

15 A. Because Edwin was taking
16 particular interest in, in Edwin's
17 words, hazing me at work.

18 Q. When did Edwin say that to you?

19 A. On September 10th while we were
20 at a renaissance faire.

21 Q. Was it just the two of you at a
22 renaissance faire?

23 A. No.

24 Q. Was it a work event?

Cheyenne Goodman - March 15, 2023

18

1 A. No.

2 Q. Who was present?

3 A. Several friends and coworkers.

4 Q. Who are they?

5 A. Roxanne Eastes, Alex Farris,
6 Joshua Brooks, Emily Jones, Emily's
7 fiancée Hayden. Joshua had a boyfriend
8 at the time. I don't remember his
9 name. I was present. Jesse Flowers.
10 The respondent was present, and Alex
11 Farris's partner was present.

12 Q. Who was Alex Farris's partner?

13 A. I don't recall their name.

14 Q. Outside of lying to Mr. Lambe,
15 what other steps did you take to
16 conceal the relationship, your sexual
17 relationship with Mr. Leon from your
18 coworkers?

19 A. I didn't.

20 Q. You took no other steps to
21 conceal the relationship?

22 A. I didn't feel the need to tell
23 my coworkers that I was being raped.

24 Q. I'm sorry. Let me go back.

Cheyenne Goodman - March 15, 2023

19

1 You testified that you told
2 your roommate Emalyn about your
3 relationship with Mr. Leon. Did you
4 tell her that you were being raped?

5 A. No. At the time I was in a
6 consensual sexual relationship with
7 him.

8 Q. And did you tell Emalyn because
9 there was a bite mark on your body and
10 she saw it?

11 A. No. I told Emalyn before that.
12 She did eventually see bite marks on my
13 body.

14 Q. Was it your decision to conceal
15 the relationship that you were having
16 with Mr. Leon?

17 A. I don't recall.

18 Q. Did you call Mr. Leon fatty in
19 communications with your colleagues?

20 A. No.

21 Q. Never in a text message?

22 A. No.

23 Q. When was the last time that you
24 asked Mr. Leon to have sex with you?

Cheyenne Goodman - March 15, 2023

20

1 A. I don't recall.

2 Q. Was it the evening of December
3 16th, 2022?

4 A. Yes.

5 Actually, I apologize.
6 Could you clarify? Was that Friday or
7 Saturday?

8 Q. Friday.

9 A. Yes.

10 Q. And when on Friday did you ask
11 Mr. Leon to have sex with you?

12 A. I don't know the approximate
13 time, but it was while we were sitting
14 at the second bar that we went to
15 before we went to Woody's.

16 Q. How did you do that?

17 A. Via Snapchat.

18 Q. Would you agree with me that you
19 and Mr. Leon were engaging in a BDSM
20 relationship? And I know you're going
21 to ask me to define that: role
22 playing, light bondage, whipping,
23 choking, toys like ball gags and
24 vibrators and marking one another.

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21

1 A. From what time period?

2 Q. Well, let's start with during
3 the period of time that you said you
4 were having a consensual relationship
5 from July until August.

6 A. I'm not sure I would define it
7 as going that far. I don't recall
8 every sexual encounter we've ever had.

9 Q. Well, were the two of you
10 generally engaging in that type of
11 sexual relationship between July and
12 August?

13 A. Yes.

14 Q. And did you continue to have
15 that type of sexual relationship with
16 him after August?

17 A. Yes.

18 Q. Was this your first real
19 experience with a BDSM relationship?

20 A. No.

21 Q. Did you discuss with Mr. Leon
22 the progression of sexual encounters
23 outside of the bedroom?

24 A. I'm not sure what you mean.

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22

1 Q. Did you talk to Mr. Leon about
2 whether to engage in these type of
3 activities, role playing, bondage,
4 whipping, choking, toys?

5 A. Is there a finish to that
6 question?

7 Q. Yes.

8 Did you discuss those things
9 outside of the bedroom when you were
10 not in the moment?

11 A. I'm sure we did. I don't recall
12 the exact conversation.

13 Q. Did the two of you discuss
14 things that you could purchase for
15 yourself like straps and whips and
16 toys?

17 A. Yes. He instructed me to do it
18 and in an effort to keep him happy I
19 complied.

20 Q. Were you sharing articles about
21 BDSM as part of a learning process with
22 Mr. Leon?

23 A. Yes. I had questions. I wasn't
24 feeling very comfortable. He declined

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1 to answer them and told me that I could
2 do my own research.

3 Q. So did you two exchange articles
4 as you were doing research about this
5 type of sexual relationship?

6 A. Yes.

7 Q. What is the significance of a
8 collar in your relationship?

9 A. I'm frankly still not sure.

10 Q. Tell me about what you
11 experienced with the collar in your
12 relationship with Mr. Leon.

13 A. I remember the first time he put
14 one on me he did not ask if it was
15 okay. I remember asking later on that
16 I thought it might be something
17 significant and I wasn't particularly
18 comfortable with the implications that
19 I thought he meant that had on our
20 relationship in a definition that I'm
21 comfortable with.

22 And I don't recall every
23 time he put it on me.

24 Q. What did you interpret the

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24

1 significance of the collar to mean?

2 A. I thought it was just something
3 that he liked to see me in.

4 Q. And what made you uncomfortable
5 about the fact that he liked to see you
6 in it, if that was the significance
7 that you ascribed to it?

8 A. My impression of his view of it
9 was that it was a sign of ownership.

10 Q. And did you tell him that you
11 didn't agree with that?

12 A. Yes.

13 Q. Did you take the collar off?

14 A. I believe he had my hands tied,
15 but I don't remember.

16 But no, I didn't take the
17 collar off until after the sexual
18 encounter had finished.

19 Q. Was that consensual?

20 A. No.

21 Q. So having your hands tied was
22 not consensual?

23 A. No.

24 Q. Do you have a safe word with

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1 Mr. Leon?

2 A. He instructed me that he did not
3 want me to have one.

4 Q. You had two safe words, did you
5 not?

6 A. No.

7 Q. No safe words?

8 A. (Witness shakes head).

9 Q. Now, after you engaged, after
10 the first time that you wore the collar
11 and he had your hands tied behind your
12 back -- when was that?

13 A. I don't believe that my hands
14 were tied behind my back. I don't
15 recall exactly.

16 Q. When was that?

17 A. I don't know.

18 Q. Was it during July and August
19 when you were engaging in the
20 consensual sexual relationship with
21 him?

22 A. I don't believe so.

23 Q. How many times after that
24 happened did you have sex with him?

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1 A. I don't recall.

2 Q. A lot?

3 A. I don't recall.

4 Q. Never again?

5 A. No.

6 Q. Did you have sex with him after
7 he did that?

8 A. Yes.

9 Q. The first time that he put the
10 collar on you, did it leave a mark?

11 A. I don't recall.

12 Q. Do you recall the next day
13 joking that you had to wear a turtle
14 neck because it left a mark?

15 A. I don't recall.

16 Q. You had indicated in your PFA
17 on one occasion that he choked you to
18 the point of passing out during a
19 discussion about wanting to end things.

20 When did that happen?

21 A. Sometime in November.

22 Q. Before Thanksgiving?

23 A. I believe it was after.

24 Q. Did you ever discuss using safe

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1 words?

2 A. Yes.

3 Q. Did you and Mr. Leon ever
4 discuss things that either of you would
5 never want to engage in, sexually that
6 is?

7 A. Yes.

8 Q. Were there things that you
9 wanted to engage in with Mr. Leon that
10 he didn't want to engage in?

11 A. I know that I brought up the
12 idea of after care at some point. I
13 had come across it in my research and
14 he told me that he was not comfortable
15 with it.

16 To the extent that we had
17 further discussions, I don't recall.

18 Q. Was one of the things that you
19 wanted to do that he wasn't comfortable
20 with be a Harry Potter rape fantasy?

21 A. No.

22 Q. Did you offer to send him fan
23 fiction about that fantasy to get him
24 comfortable with the idea of that

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1 particular role play?

2 A. No.

3 Q. Was one of the things that you
4 discussed with Mr. Leon that you were
5 uncomfortable with oral sex?

6 A. Yes.

7 Q. And is that because for you that
8 act was the ultimate test of trust?

9 A. I think that's a rather extreme
10 thing to say. I certainly have trust
11 issues regarding that act.

12 Q. Why is that something that
13 you're so uncomfortable with?

14 A. To me it feels rather degrading.

15 Q. At some point in your
16 relationship did you agree to give
17 him oral sex?

18 A. Yes.

19 Q. And for the two of you was that
20 a big step because you were engaging in
21 something that you otherwise wouldn't
22 like to do?

23 A. Yes.

24 Q. Was that because it was

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1 something you wanted to do for him?

2 A. It was something that he made
3 clear was a requirement for him and I
4 did it to pacify him.

5 Q. Did you have other boyfriends
6 during this period of time from July
7 until December?

8 A. No.

9 Q. Okay. I want to talk about
10 December 16th.

11 When Mr. Leon got to -- so,
12 first of all, what happened in the
13 morning of December 16th?

14 A. Was that that Saturday?

15 Q. I'm sorry. That Friday.

16 MS. WEIR: I just want to
17 make an objection to the record in
18 regards to I have an pending emergency
19 motion in limine because there were
20 audio and videos that Kara Swasey had
21 subpoenaed and were produced to her and
22 she agreed to voluntarily produce those
23 to me. And my client has not had an
24 opportunity to review any of those

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1 audio or video files today.

2 So I'm making this objection
3 on the record that any questions asked
4 regarding the evening of December 16th
5 into the early morning of December
6 17th, which I believe is the time frame
7 of the Woody's Philadelphia audio and
8 video surveillance and the Chandler
9 Properties' audio and video
10 surveillance, that any questions asked
11 of my client during those dates and
12 times I'm not instructing her not to
13 answer so she can answer, but I want
14 the transcript to reflect the objection
15 that if opposing counsel tries to use
16 this deposition transcript in relation
17 to those videos that I'm objecting as
18 we have not had an opportunity to
19 review the videos.

20 MS. SWASEY: Your objection
21 is on the record.

22 Your client is to tell the
23 truth now about her recollection,
24 whether she saw the videos or not, and

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1 you have given her the instruction to
2 answer the question.

3 MS. WEIR: Okay.

4 BY MS. SWASEY:

5 Q. I understand that earlier in the
6 day -- and I'm calling it December
7 16th; I'll call it Friday -- that you
8 went to a toy drive that Mr. Leon was
9 sponsoring at Target.

10 A. Our firm was sponsoring it, but
11 yes.

12 Q. Who from your firm was there?

13 A. Joshua Brooks, the respondent,
14 Maggie Greecher and Maggie brought her
15 children.

16 Q. And you?

17 A. Yes.

18 Q. Where did you all go to dinner
19 that night?

20 A. I don't recall the name of the
21 restaurant.

22 Q. Somewhere in Philadelphia?

23 A. Yes.

24 Q. And how did you get there?

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1 A. I was driven by a coworker.

2 Q. Who was the coworker?

3 A. Carol Thompson. I believe her
4 last name is Cox now.

5 Q. Do you know how Ms. Cox -- I'm
6 sorry. Do you know how Mr. Leon got
7 there?

8 A. He drove.

9 Q. And do you know where he parked?

10 A. I do not.

11 Q. Did you have any alcoholic
12 beverages at dinner?

13 A. Yes.

14 Q. How many?

15 A. I finished one. I think I had a
16 couple of sips of the second.

17 Q. And after you left the
18 restaurant where you had dinner where
19 did you go?

20 A. We walked around for quite some
21 time trying to find a speakeasy bar.
22 They were full so then we went to a
23 different bar called Devil's Alley.

24 Q. And how many drinks did you have

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1 at Devil's Alley?

2 A. I took a shot with the group and
3 I had a few sips of a mixed drink and I
4 had a water.

5 Q. And where did you go after
6 Devil's Alley?

7 A. To Woody's.

8 Q. And what did you have to drink
9 at Woody's, alcoholic beverages?

10 A. I started the night having a
11 vodka Red Bull. I did not finish it.
12 I don't recall how many sips of how
13 many alcoholic beverages I had.

14 The respondent continued to
15 buy them and hand them to me and I
16 continued to put them down on the
17 ground where I was standing. I had
18 several cups of water.

19 Q. Were you using Xanax that night?

20 A. No.

21 Q. Was Mr. Leon drinking?

22 A. Yes.

23 Q. How many drinks did you observe
24 him have?

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1 A. I observed him have at least one
2 at dinner. I observed him take a shot
3 with our group at Devil's Alley and I
4 observed him sipping on cups of drinks
5 throughout the night at Woody's.

6 However, I don't know how
7 many he had.

8 Q. Why did you leave Woody's that
9 night?

10 A. Because I wanted to go home.

11 Q. Were you kicked out of the bar?

12 A. No.

13 Q. Did you tell any of your
14 coworkers that you were kicked out of
15 the bar?

16 A. No.

17 Q. When you were at Woody's did you
18 and Mr. Leon kiss?

19 A. I believe he kissed me.

20 Q. When was that? Early in the
21 night or later?

22 A. I don't recall.

23 Q. When you left Woody's that night
24 who was with you?

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1 A. I was by myself.

2 Q. Did you call my client?

3 A. He Snapchated me or texted me --

4 I don't recall which one -- to ask

5 where I was. I called him to tell him

6 that I was going home.

7 Q. And did you proceed to leave?

8 A. No. He told me to wait and he

9 was going to bring me my jacket.

10 Q. Where was your jacket?

11 A. I had left it inside.

12 Q. And did you wait?

13 A. Yes.

14 Q. Did you tell your friends that

15 you were with Mr. Leon after you left?

16 I'm sorry. The friends that

17 were at the club with you.

18 A. At what point?

19 Q. After you left.

20 A. Yes.

21 Q. And at what point after you left

22 did you tell them?

23 A. Nehama texted me to ask where I

24 was and I told her that I was going to

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1 find a Uber home but that Edwin was
2 following me and I was trying to get
3 away from him. So I guess if you
4 classify that as me being with him,
5 sure.

6 Q. Did you also have a phone call
7 with Nehama after you left the club?

8 A. Yes.

9 Q. What did you tell her was
10 happening during the phone call?

11 A. That he was chasing me.

12 Q. Did you see any of your other
13 friends and coworkers outside of
14 Woody's after you and Mr. Leon were
15 outside?

16 A. Yes.

17 Q. Who did you see?

18 A. Emily Jones and her fiance
19 Hayden.

20 Q. Did you see them or did you talk
21 to them?

22 A. I spoke to them.

23 Q. For about how long were you
24 speaking with Emily and Hayden?

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1 A. I don't recall.

2 Q. Was Mr. Leon with you?

3 A. Yes.

4 Q. Was that before or after you
5 told Nehama Hanoach that he was chasing
6 you?

7 A. Before.

8 Q. At what point did that
9 conversation end? You said you don't
10 recall how long that was?

11 A. (The witness nodded.)

12 Q. How did it end?

13 A. I insisted that I wanted to go
14 home alone. All three of them
15 objected. I insisted that I would be
16 fine; I had lived in the city before; I
17 was okay to go home alone; I wasn't
18 going to the same place that any of
19 them were.

20 I began to walk away because
21 it was clear that they were, you know,
22 not listening to me. Edwin and Hayden
23 followed me. I turned around and told
24 both Edwin and Hayden to leave me

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1 alone, I was going to take a Uber home,
2 and I kept walking.

3 Q. And did Edwin and Hayden follow
4 you?

5 A. Edwin followed. I don't know
6 how far Hayden followed. I didn't turn
7 back around.

8 Q. Did Hayden for some period of
9 time follow you?

10 A. I believe he followed me like
11 around the corner.

12 Q. Did you have a weapon on you?

13 A. Yes.

14 Q. What did you have?

15 A. I had a pocketknife.

16 Q. And where did you keep that
17 knife?

18 A. Tucked into my boot.

19 Q. When you were standing with
20 Emily Jones and Hayden outside of
21 Woody's did you tell them that he was
22 threatening you?

23 A. No.

24 Q. Did you tell them that he was

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1 making you uncomfortable?

2 A. No.

3 Q. At any point did Mr. Leon put
4 his hands on you after you left
5 Woody's?

6 A. Yes.

7 Q. And when was that?

8 A. At some point while I was
9 walking from Woody's to City Hall.

10 Q. And what did he do?

11 A. He was grabbing my arms trying
12 to pull me back toward him.

13 Q. Did it leave a mark?

14 A. He left bruises.

15 Q. Did you take pictures of those
16 bruises?

17 A. Yes.

18 Q. Where in the course of your walk
19 between Woody's and City Hall did he
20 grab you?

21 A. I don't recall.

22 Q. Was it just once?

23 A. No.

24 Q. How many times?

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1 A. At least twice. I would say a
2 few.

3 Q. So what time did you get to City
4 Hall?

5 A. I don't recall.

6 Q. What happened when you got to
7 City Hall?

8 A. I began running and Edwin began
9 chasing me.

10 Q. When did the rest of the group
11 get to City Hall?

12 A. Sometime after that.

13 Q. How long?

14 A. I don't recall.

15 Q. Minutes?

16 A. I don't recall.

17 Q. Who arrived from the group to
18 City Hall?

19 A. At that point I had been sobbing
20 hysterically having a panic attack
21 because he had been chasing me. I
22 recall Nehama getting there. I recall
23 Emily Jones talking to me with her arms
24 around me and I recall Roxanne Eastes.

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1 I am aware at some point
2 Hayden arrived, Tim arrived and Alex
3 arrived. I couldn't tell you what
4 time.

5 Q. Did they come separately? So
6 Nehama, Emily, Roxanne were there first
7 and then Hayden, Tim and Alex after?

8 A. I don't recall.

9 Q. Did you see the interaction
10 between Nehama Hanoch and Mr. Leon at
11 City Hall?

12 A. No.

13 Q. Where were you when they had
14 their interaction?

15 A. I was sitting on one of the
16 steps in front of City Hall. I had
17 been having a panic attack. I had my
18 hands over my ears. I was crying. At
19 some point I had my head between my
20 legs.

21 Q. What did you understand happened
22 between Ms. Hanoch and Mr. Leon at City
23 Hall?

24 A. I understand that she got in

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1 between us. I understand the
2 accusations that he made following
3 that. I don't have any personal
4 knowledge of what happened.

5 Q. When you say "she got in between
6 us," where were you in physical
7 proximity to Mr. Leon when Ms. Hanoch
8 got in between you?

9 A. He was chasing me and I remember
10 her running towards me and putting her
11 arm around me on the side that he was
12 chasing me from.

13 Q. Did you tell any of your
14 coworkers what happened between you
15 and Mr. Leon that night?

16 A. Yes.

17 Q. Who did you tell?

18 A. I believe I told Nehama Hanoch,
19 Tim Powell, Emily Jones. I told my
20 partner mentor Joe Barry. I told
21 Roxanne Eastes.

22 It's possible I told others,
23 but I don't recall. As you can
24 imagine, it was a very stressful time.

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1 Q. What did you tell those five or
2 six people happened?

3 A. Exactly what I just told you.

4 Q. When did you tell each of those
5 people?

6 A. I don't recall.

7 Q. Was it that night?

8 A. I know that I was in a car with
9 Nehama and Emily on the way home. I
10 know that I was still having panic
11 attacks and sobbing and I know that I
12 was talking to them.

13 I don't recall the content
14 of the conversation.

15 Q. Where did you go home to that
16 night?

17 A. My apartment.

18 Q. Were you alone?

19 A. Yes.

20 Q. Was Mr. Leon the only person of
21 color in the group?

22 A. On that evening?

23 Q. Yes.

24 A. Yes.

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1 Q. Were you in an Uber with Nehama
2 and Emily?

3 A. No.

4 Q. Who was driving?

5 A. Emily's fiancee.

6 Q. So it was in a car with Nehama,
7 Emily and Hayden on the ride home?

8 A. You asked about my coworkers.

9 Q. Was there anybody else in the
10 car?

11 A. Not that I recall.

12 Q. What time did you get home?

13 A. I don't recall.

14 Q. And do you know how many times
15 you called Mr. Leon that night?

16 A. No.

17 Q. Did he call you that night,
18 Friday night or the wee hours of the
19 morning?

20 A. I don't recall.

21 Q. Do you typically call him on --
22 is there one phone number or more than
23 one phone number that you call him on?
24 Does he just have one number?

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1 A. To my knowledge.

2 Q. I just want to review something
3 really quick.

4 If you were going to
5 encapsulate, what happened on Friday
6 night? What happened on Friday night?

7 A. You want me to encapsulate the
8 evening?

9 Q. Yes, encapsulate it.

10 A. Edwin scared me. I ran from
11 him. He chased me.

12 Q. When you talked to Mr. Leon
13 later that night did you acknowledge
14 that you panicked because you panicked?

15 A. I told him I was afraid of him
16 and I asked him why he continued to
17 chase me after I asked him not to.

18 Q. What was his response?

19 A. He -- I don't recall the exact
20 wording. He said something about he
21 was going to take me home; he was
22 trying to keep me safe; I shouldn't be
23 walking in the city with such a short
24 skirt.

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1 Q. Did he think that you were
2 intoxicated? Did he tell you that he
3 thought you were intoxicated?

4 A. He did.

5 Q. Did you think you were
6 intoxicated?

7 A. I had had drinks that evening.
8 I don't think that I was -- I wouldn't
9 classify myself as being very drunk. I
10 think more than anything I was having a
11 panic attack.

12 Q. Would you have driven yourself
13 home?

14 A. I don't drive after drinking
15 anything, so no.

16 Q. About how long were your phone
17 conversations with Mr. Leon that
18 night?

19 A. I fell asleep on the phone so I
20 don't recall.

21 Q. Did you go back and look at your
22 records?

23 A. No.

24 Q. Did you think that he was going

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1 to rape you that night?

2 A. I thought that if he got me in
3 his car and took me home that he would
4 absolutely.

5 Q. Who did you tell that to?

6 A. I don't recall. I believe -- I
7 don't recall.

8 Q. The next morning do you know how
9 many times you called Mr. Leon? And
10 this is the morning I'm going to say
11 post-8:00 a.m. Everybody wakes up and
12 then the next morning.

13 Do you know how many times
14 you called him?

15 A. I don't recall. I was very
16 afraid of his temper and very motivated
17 to pacify him based on his temper in
18 the past. Likely several.

19 Q. Do you know how many times he
20 called you?

21 A. No.

22 Q. Let's go back to Friday night.

23 Did you know that he was
24 leaving the firm?

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1 A. Yeah.

2 Q. When was his last day?

3 A. I am not sure.

4 Q. Was it the end of the year?

5 A. Sure.

6 Q. The next morning, so the next
7 morning you called him and you said
8 probably several times. Do you know
9 how many times he called you?

10 A. No.

11 Q. Did he call you at all?

12 A. I don't know.

13 Q. Did you go back and review your
14 phone records for that morning?

15 A. No.

16 Q. Before noon that day how many
17 people that you went out with the night
18 before had you talked to other than
19 Mr. Leon?

20 A. I believe only Nehama Hanoach.

21 Q. And when did you talk to Nehama?

22 A. Early in the morning.

23 Q. And what did you talk about?

24 A. I expressed that I was really

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1 upset and she comforted me.

2 Q. Did you talk to Roxanne Eastes?

3 A. It's possible, but I don't
4 recall.

5 Q. Did you tell Ms. Hanoch that you
6 were going over to Mr. Leon's home?

7 A. No.

8 Q. Did you tell her that you were
9 going to your mother's house?

10 A. Yes.

11 Q. And were you doing that to
12 mislead her as to where you were
13 going?

14 A. I was going to my mother's house
15 later in the day.

16 Q. What time did you arrive at
17 Mr. Leon's?

18 A. I don't recall.

19 Q. Was it afternoon?

20 A. I don't recall.

21 Q. Was it in the evening?

22 A. No.

23 Q. Did you tell anyone that you
24 were going to Mr. Leon's house?

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1 A. No.

2 Q. Why not?

3 A. He had threatened me by saying I
4 have to fix this; I better make it
5 right or he was going to file a police
6 report against Nehama.

7 I knew that if I told my
8 friends that I was going to go to his
9 house to pacify his anger at me and at
10 her to alleviate that threat that in
11 the interest of my safety they would
12 object. And he had conditioned me to
13 want to pacify him when he's angry and
14 I didn't know how to explain that to
15 them.

16 Q. But you didn't tell your mother,
17 you didn't tell your roommate, you
18 didn't tell anybody else that you were
19 going over there even though this is
20 the person you said was going to rape
21 you the night before?

22 A. I told my mother when I got
23 home.

24 Q. After you were at Mr. Leon's?

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1 A. Yes.

2 Q. How long were you at Mr. Leon's?

3 A. I don't know exactly. I would
4 say several hours.

5 Q. What time did you leave?

6 A. I don't know exactly.

7 Q. Was it after dark?

8 A. I believe so.

9 Q. Are you aware that Mr. Leon
10 has on his first floor surveillance
11 cameras?

12 A. Yes.

13 Q. When you were at Mr. Leon's for
14 several hours did you feel like you
15 couldn't leave?

16 A. I didn't feel like he would
17 physically stop me from leaving. I
18 felt like that he would follow through
19 on all of the threats that he made if I
20 did leave.

21 Q. Did you ask Mr. Leon to go
22 upstairs?

23 A. Yes.

24 Q. And how long were you upstairs?

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1 A. I'm not sure.

2 Q. The vast majority of the time
3 that you were there?

4 A. Yes.

5 Q. Why did you ask to go upstairs?

6 A. Because I had repeatedly
7 requested that he never record me while
8 I'm in his house. He insisted that he
9 wasn't and I just didn't trust him.

10 Q. So, again, this is a person that
11 you thought was going to rape you the
12 night before and you wanted to move in
13 his house to an area that wasn't being
14 recorded?

15 A. Yes.

16 Q. Why?

17 A. Because I knew that he was going
18 to try to use it against me and he had
19 threatened in the past that he would
20 tell our firm that we had had a sexual
21 relationship and that it would be
22 something that would lead to me getting
23 fired and I didn't want to add to that
24 fire.

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1 Q. Are you aware that there were
2 other associates and law clerks having
3 sexual relationships at Young Conaway?

4 A. No.

5 Q. You're not aware of anybody else
6 having a sexual relationship at Young
7 Conaway or a dating relationship in the
8 associates class?

9 A. I'm aware that there are
10 associates who had slept together in
11 the past but only from Edwin.

12 And I'm also aware that they
13 also apparently went to great pains
14 under the impression that somebody
15 would be fired for it.

16 Q. Were any of them fired?

17 A. I don't know. One of them had
18 left the firm since. I don't know.

19 Q. Has Nehama had a sexual
20 relationship with another associate?

21 A. Not that I know of.

22 Q. Was there a camera on the second
23 floor?

24 A. Not that I know of.

Cheyenne Goodman - March 15, 2023

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1 Q. When you were upstairs did you
2 engage in a sexual encounter with
3 Mr. Leon?

4 A. Are you classifying sexual
5 assault as a sexual encounter?

6 Q. Did you have a sexual encounter
7 with Mr. Leon?

8 A. No.

9 Q. Did you leave a hickey on
10 Mr. Leon's shoulder during your sexual
11 encounter?

12 A. No.

13 Q. What happened when you were
14 upstairs at Mr. Leon's?

15 A. Broadly? Are you asking for
16 just the gist?

17 Q. Yes, start there.

18 A. He sexually assaulted me.

19 Q. What happened specifically? So
20 you walked upstairs. What happened
21 after you got upstairs?

22 A. We had conversation for a short
23 while.

24 Q. Sorry. You had conversation?

Cheyenne Goodman - March 15, 2023

55

1 A. (The witness nodded.)

2 Q. For a while?

3 A. (The witness nodded.)

4 Q. How long is "a while"?

5 A. I don't recall.

6 Q. And where were you during this
7 conversation?

8 A. In part in his bedroom and in
9 part in his bathroom.

10 Q. And were you on the bed?

11 A. Yes.

12 Q. Were you laying on the bed?

13 A. I believe he was laying down and
14 I was sitting.

15 Q. Were you fully clothed?

16 A. Yes.

17 Q. Was he fully clothed?

18 A. Yes.

19 Q. When you walked up the stairs
20 were you holding hands?

21 A. I believe he had his arms around
22 me. I was having a panic attack like
23 the entire morning and I think he
24 probably -- I don't want to speculate

Cheyenne Goodman - March 15, 2023

56

1 to his mindset.

2 My impression was he thought
3 I might fall down the stairs because I
4 was so upset and not paying attention.

5 Q. Did you take your Xanax that
6 day?

7 A. No.

8 Q. By Xanax I mean your Klonopin?

9 A. No.

10 Excuse me actually. I
11 didn't take it in the day. I took it
12 at night.

13 Q. The night before?

14 A. The night of that day.

15 Q. That night?

16 A. Yeah.

17 Q. So you were sitting on the bed.
18 He was laying on the bed. You were
19 talking for some time.

20 At what point did the two of
21 you begin to engage in any sexual
22 encounter?

23 A. We had gone into the bathroom
24 because when I have panic attacks it

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1 helps me to sit with the shower running
2 normally. He attempted to kiss me. I
3 pulled away.

4 Q. Were you in the shower?

5 A. No.

6 Q. Just in the bathroom with the
7 steam?

8 A. With the water running for the
9 noise.

10 Q. Okay. So he attempted to kiss
11 you. You pulled away?

12 A. Yes.

13 Q. And then what?

14 A. He attempted to push me up
15 against the counter and like position
16 himself behind me to initiate sex. I
17 pushed him away and I told him that I
18 didn't want to have sex.

19 But at this point I had
20 rejected his sexual advances several
21 times that day. He was already angry
22 with me. He had already made several
23 angry comments about how I had been
24 rejecting him, how he needs sex to calm

Cheyenne Goodman - March 15, 2023

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1 down, if I cared about him I would be
2 putting his needs before my own.

3 And he grabbed my sweatshirt
4 and lifted it above my head. And I
5 didn't fight him because I was afraid
6 of what he would do if I kept rejecting
7 him.

8 Q. Did he take your sweatshirt off?

9 A. Yes.

10 Q. Then what happened?

11 A. He pushed me to my knees.

12 Q. And then what happened?

13 Do you want to take a break?

14 A. Yes. Can we take a break?

15 Q. Yes.

16 MS. SWASEY: We're going to
17 go off the record.

18 (A discussion was held off
19 the record.)

20 BY MS. SWASEY:

21 Q. So I think the last thing you
22 said is that he took your sweatshirt
23 off.

24 What happened after that?

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1 A. He pushed me to my knees in
2 front of him. And I closed my mouth
3 and I kept my eyes clamped shut because
4 I knew what he wanted. And he pulled
5 his pants down and he put his hand on
6 my jaw and squeezed to open my mouth
7 and forced himself on me.

8 Q. And how long did that last for?

9 A. I don't recall. I recall at a
10 certain point I pulled away and asked
11 him to please stop and I told him I
12 couldn't do this.

13 And he pulled me back and I
14 pulled away again and begged him to not
15 finish. And he said no and pulled me
16 back and it went on until he finished.

17 Q. Did you bite him?

18 A. (Witness shakes head).

19 Q. Did he leave a mark on your
20 mouth?

21 A. (Witness shakes head).

22 Q. How long after you got upstairs
23 did that happen?

24 A. I would say at least a couple of

Cheyenne Goodman - March 15, 2023

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1 hours.

2 Q. And what happened after -- I'm
3 sorry to be crass. When you say he
4 finished, he ejaculated?

5 A. (The witness nodded.)

6 Q. Okay. What happened after that?

7 A. I spit into the shower and I
8 collapsed onto the ground and was
9 crying and he walked out.

10 Q. How long were you there?

11 A. I would say several minutes.

12 Q. And then what?

13 A. I got up. I put my sweatshirt
14 back on. I walked into his room. He
15 was on the bed and I told him I was
16 leaving.

17 Q. Did you brush your hair or brush
18 your teeth?

19 A. No.

20 Q. So you were just upstairs then
21 for a couple of minutes longer after
22 that happened?

23 A. No. I told him I was leaving
24 and he got upset again and he asked me

Cheyenne Goodman - March 15, 2023

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1 what I would do to fix it and
2 reinitiate the conversation. He
3 insisted that I lay down with him for a
4 while and I complied because I was
5 afraid of him.

6 And after I felt like it had
7 been long enough that he would let me
8 leave, I got up and I told him I wanted
9 to leave and I really wanted to go home
10 and be with my mom. And we walked
11 downstairs.

12 Q. And then what?

13 A. He hugged me. And then he told
14 me that he trusted me and he knows that
15 I'll make this right and that if I
16 don't there will be consequences.

17 Q. What consequences would there
18 be?

19 A. At some point during when we
20 were upstairs he told me that he was
21 going to press charges against Nehama
22 and in the course of that he was going
23 to make sure that the firm found out
24 that we had had a sexual relationship

Cheyenne Goodman - March 15, 2023

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1 to put my job at risk, that I would
2 have to disclose the police involvement
3 to the Bar, that I might not pass
4 because of it, that Nehama would have
5 to disclose it to the Bar. She was a
6 candidate for the UBE. It's the
7 Uniform Bar Exam.

8 He told me that my friends
9 would never forgive me for not telling
10 them what had been going on and that my
11 coworkers, who are also my friends,
12 would feel the same.

13 I took all that to mean
14 that is the consequences that he was
15 implying and that he was going to sue
16 Nehama civilly and press charges
17 against her.

18 Q. When you went downstairs and
19 were staying goodbye to Edwin, was that
20 the only time that you went downstairs
21 during this encounter?

22 A. I don't recall.

23 Q. Were you having a panic attack
24 at that point?

Cheyenne Goodman - March 15, 2023

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1 A. When I left I was very calm. I
2 was having a panic attack when I
3 arrived. It continued until like as we
4 were going upstairs. And he had been
5 very calm talking to me at first and as
6 he started to talk more after we got
7 upstairs he was calm and then I calmed
8 down.

9 And then he got angry after
10 I told him that I didn't see what
11 happened between him and Nehama and I
12 couldn't testify or sign an affidavit
13 or say anything to that effect because
14 I just didn't see it. And that
15 re-ignited my panic attack, which
16 continued through the sexual assault.

17 And I calmed down. I think
18 I was just in shock at the time I
19 walked out of the bathroom into his
20 room.

21 Q. At what point, at what point did
22 you block him on your phone?

23 A. The next day.

24 Q. At what point did you tell him

Cheyenne Goodman - March 15, 2023

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1 not to contact you?

2 A. I don't recall.

3 Q. Did you ever tell him not to
4 contact you?

5 A. I know that I said it during our
6 consensual call. I don't know when
7 else I said it, if I did.

8 Q. What is a consensual call?

9 A. It's a call sanctioned by the
10 police and the DA where he is being
11 recorded but doesn't know about it.
12 And I was instructed that I could say
13 whatever lie to appeal to him in order
14 to get him to discuss what he did to me
15 on that Saturday.

16 Q. And that was what date?

17 A. Late December. I don't recall
18 the exact date but it's in the
19 petition.

20 Q. What lies did you tell on that
21 call in order to get him to confess
22 that he did something wrong?

23 A. I think I told him that I was
24 sorry, that I didn't mean for it to

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65

1 blow up this much.

2 I think I told him that
3 Nehama initiated things, which was
4 actually the suggestion by the police
5 officer.

6 Q. That Nehama initiated what?

7 A. Just the whole me coming forward
8 and telling people what happened.

9 Q. Did you go to more than one
10 police department?

11 A. No.

12 Q. Just one police department?
13 What police department was that?

14 A. The Plymouth Meeting Police
15 Department.

16 Q. What is your understanding of
17 where the charges stand today?

18 A. The last time I spoke to
19 Detective Moretti he said he was
20 waiting to hear back from the DA about
21 the DA meeting with me.

22 Q. And when was that?

23 A. I believe on Monday of this
24 week.

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1 Q. Do you know if Mr. Leon tried to
2 call Nehama?

3 A. Yes.

4 Q. Do you know when that happened?

5 A. The day of the consensual call.

6 Q. I'm sorry. You said during the
7 consensual call you told him not to
8 contact you?

9 A. (The witness nodded.)

10 Q. So even after you told him that
11 you were sorry, that Nehama initiated
12 it and it wasn't his fault, at the end
13 you said don't contact me?

14 A. (The witness nodded).

15 MS. WEIR: I'm sorry. Make
16 sure you give a verbal response.

17 A. Yes.

18 Q. How many times did you tell
19 Mr. Leon not to contact you?

20 A. I don't recall. I know I said
21 it at least once.

22 Q. And at least once being on that
23 consensual call?

24 A. Yes.

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1 Q. In your PFA you said that you
2 repeatedly told him not to contact you.
3 What did you mean?

4 A. On what day?

5 Q. The day you wrote your PFA you
6 said I repeatedly told him not to
7 contact me.

8 A. In the consensual call?

9 Q. I'm asking you. In the PFA
10 that's what you said.

11 The only time you can recall
12 telling him not to contact you is in
13 the consensual call?

14 A. Well, sitting here today, yes,
15 the only time that I can recall the
16 exact phrasing of me saying don't
17 contact me again.

18 Q. Was there something else, was
19 there some other communication where
20 you gave him the gist of don't contact
21 me again?

22 A. Yes.

23 Q. When was that?

24 A. He had been calling me from a

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1 blocked number on Christmas day. I
2 answered the second call because it
3 didn't occur to me that it might be
4 him.

5 He said something and I said
6 Edwin? Because I didn't know if it was
7 him or not. He confirmed that it was
8 him and I said I don't want to talk to
9 you and I hung up on him.

10 Q. When did you report what
11 happened to Young Conaway?

12 A. The Sunday of the weekend in the
13 PFA, so that would be --

14 Q. The 18th?

15 A. Yes.

16 Q. What did you report happened?

17 A. I reported everything from
18 Friday of that evening and certain
19 other things that he had done in the
20 course of being my supervisor at work.

21 Q. Did you report what happened on
22 Saturday --

23 A. No.

24 Q. -- to Young Conaway?

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1 A. No.

2 Q. Have you ever?

3 A. No.

4 Q. What did you report were the
5 things that he did during the course of
6 work?

7 A. I was instructed not to answer
8 that.

9 Q. What did he do during the course
10 of work that made you uncomfortable?

11 A. He was very aggressive with me.
12 He made me believe that he was in a
13 supervisory role over me, which turned
14 out not to be true.

15 He would frequently assign
16 me work late in the evening and demand
17 it be available by the time he woke up
18 the next morning. This included on the
19 weekends.

20 He would tell me things that
21 -- I'm not sure if they were true or
22 not. He would tell me that my
23 coworkers were saying mean things about
24 me. He would lie to my coworkers about

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1 me.

2 He would get angry with me
3 if I didn't answer the e-mails fast
4 enough or if I didn't help him with
5 certain projects fast enough. He got
6 angry with me about my office
7 placement.

8 Q. Did you lie when you made a
9 report to Young Conaway on December
10 18th?

11 A. No.

12 Q. What day did you go to the
13 police?

14 A. I don't recall the date. It's
15 in my petition.

16 Q. What evidence did you provide to
17 the police to support your claims?

18 A. I provided them with a
19 statement. I later on allowed a
20 detective to go through my text
21 messages with the respondent.

22 Q. Did you retain any of your
23 Snapchats with Mr. Leon?

24 A. In order to block him Snapchat

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1 deletes everything, so no.

2 Q. So when you took the step of
3 blocking him you deleted the chat?

4 A. I didn't realize it would delete
5 the chat.

6 Q. But it did? It deleted your
7 yours and it deleted his?

8 A. If it deleted his this is the
9 first time I'm hearing of it.

10 Q. Did anyone encourage you to make
11 the police report?

12 A. No one encouraged me to make it.
13 My friends were expressing their
14 support in one way or the other.

15 Q. Who took you to make the police
16 report?

17 A. Chris Lambe and I and Nehama
18 Hanoach.

19 Q. And what made you decide to make
20 that police report four days after that
21 sexual contact?

22 A. I knew that I couldn't live with
23 myself if I stayed quiet and he did it
24 to someone else.

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1 Q. Did you ever ask the firm to --
2 did you request an office by him?

3 A. No.

4 Q. Did you reach out to Mr. Leon's
5 ex-girlfriends?

6 A. No.

7 Q. Ever?

8 A. I was friends with Evie on
9 Instagram. It's possible that I liked
10 her Instagram stories before. I don't,
11 I don't classify that as reaching out
12 to his ex-girlfriends.

13 Q. In the PFA you checked the box
14 saying that my client was trespassing on
15 your property.

16 Was that in error?

17 A. No. He left a voicemail for me
18 on December 25th saying that he was
19 going to come to my apartment. I don't
20 know if he did or not because I was not
21 at my apartment. I was at a friend's
22 apartment for safety because I worried
23 that he might do exactly that.

24 Q. Okay. So what is your claim for

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1 trespass? Do you believe that he came
2 to your apartment and was inside of
3 your apartment without your permission?

4 A. I believe he was inside the
5 building without my permission.

6 Q. When was that?

7 A. December 25th.

8 Q. Why do you believe that?

9 A. Because he told me he would in a
10 voicemail.

11 Q. Do you have any actual knowledge
12 of whether he was there?

13 A. Nothing beyond his
14 representation.

15 MS. SWASEY: It's 3:30 and I
16 know I'm running up against...

17 BY MS. SWASEY:

18 Q. Are you in a dating relationship
19 with Jesse Flowers?

20 A. No.

21 Q. Have you ever been?

22 A. No.

23 Q. I think you told me a list of
24 people who knew about what happened on

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1 Friday.

2 Who knows about what
3 happened on Saturday?

4 A. Detective Andrew Moretti,
5 Detective Walter Kerr, K-e-r-r, Nehama
6 Hanoach, my former roommate Emily
7 Bartholomew, obviously myself and
8 Edwin.

9 Q. I just need to take a look real
10 quick and see what else I missed.

11 I think that's it. We're
12 done.

13 MS. SWASEY: There's another
14 deposition immediately after this so we
15 can go off the record.

16 (Deposition concluded at
17 3:35 p.m.)

18 - - - - -

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I N D E X

DEPONENT: CHEYENNE GOODMAN PAGE

Examination by Ms. Swasey 3

(There were no exhibits
marked for identification.)

DIRECTIONS NOT TO ANSWER PAGE LINE

NONE

REQUESTS MADE FOR DOCUMENTS PAGE LINE

NONE

CERTIFICATE OF REPORTER PAGE 76

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1 State of Delaware)
2)
New Castle County)

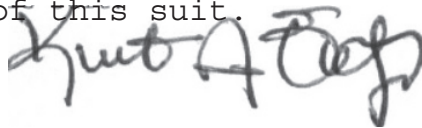
3 CERTIFICATE OF REPORTER

4 I, Kurt A. Fetzer, Registered
5 Diplomat Reporter and Notary Public,
do hereby certify that there came
6 before me on Wednesday, March 15, 2023,
the deponent herein, CHEYENNE GOODMAN,
7 who was duly sworn by me and
thereafter examined by counsel for the
8 respective parties; that the questions
asked of said deponent and the answers
9 given were taken down by me in
Stenotype notes and thereafter
10 transcribed by use of computer-aided
transcription and computer printer
under my direction.

11 I further certify that the foregoing
12 is a true and correct transcript of the
testimony given at said examination of
13 said witness.

14 I further certify that reading and
signing of the deposition were waived
15 by the deponent and counsel.

16 I further certify that I am not
counsel, attorney, or relative of
17 either party, or otherwise interested
in the event of this suit.

18 

19
20 Kurt A. Fetzer, RDR, CRR
21
22
23
24

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ATTORNEY ETHICS GRIEVANCE FORM

Filed and Attested by the
Office of Judicial Records
09 FEB 2024 02:26 pm
C. PERET

Please Type Or Print Legibly All Information

A. GRIEVANT: Mr./Mrs./Miss./Ms. (Circle One)

cheyenne

LAST NAME FIRST MIDDLE

goodman

ADDRESS STREET/P.O. BOX

CITY STATE ZIP COUNTY

TELEPHONE: DAY [REDACTED] EVENING ()

B. THE SPECIFIC LAWYER YOU ARE COMPLAINING ABOUT IS:

Leon Edwin

LAST NAME (INCLUDE SR., JR., III, ETC.) FIRST MIDDLE

Unknown

OFFICE ADDRESS STREET/P.O. BOX

CITY STATE ZIP COUNTY

- (1) IS THE SPECIFIC LAWYER COMPLAINED ABOUT YOUR LAWYER? YES ☒ NO ☐
- (2) IF SO, DOES THIS LAWYER STILL REPRESENT YOU? YES ☐ NO ☒
- (3) IF NOT, DO YOU HAVE A NEW LAWYER? YES ☐ NO ☒
- (4) IF SO, WHO IS YOUR NEW LAWYER? _____

C. THE TYPE OF CASE HANDLED BY THE LAWYER WAS: (CHECK ONE)

- | | | | |
|--|---|--------------------------------|------------------------------|
| <input type="checkbox"/> Admiral/Maritime | (V) <input type="checkbox"/> | International Law | (I) <input type="checkbox"/> |
| <input type="checkbox"/> Adoption/Name Change | (A) <input type="checkbox"/> | Juvenile Delinquency | (J) <input type="checkbox"/> |
| <input type="checkbox"/> Bankruptcy/Insolvency/Foreclosure | (B) <input type="checkbox"/> | Labor | (L) <input type="checkbox"/> |
| <input type="checkbox"/> Collection | (H) <input type="checkbox"/> | Landlord/Tenant | (Q) <input type="checkbox"/> |
| <input type="checkbox"/> Contract | (K) <input type="checkbox"/> | Negligence (Personal Injury) | (N) <input type="checkbox"/> |
| | | Property Damage | |
| <input type="checkbox"/> Corporation/Partnership Law | (X) <input type="checkbox"/> | Patent/Trademark/Copyright | (P) <input type="checkbox"/> |
| <input type="checkbox"/> Criminal, Quasi-Criminal and Municipal Court | (C) <input type="checkbox"/> | Real Estate | (R) <input type="checkbox"/> |
| <input type="checkbox"/> Domestic Relations (Divorce, Support, Custody) | (D) <input type="checkbox"/> | Small Claims Court | (S) <input type="checkbox"/> |
| <input type="checkbox"/> Estate/Probate | (E) <input type="checkbox"/> | Tax | (T) <input type="checkbox"/> |
| <input type="checkbox"/> Federal Remedies/Civil Rights | (F) <input type="checkbox"/> | Workers' Compensation | (W) <input type="checkbox"/> |
| <input type="checkbox"/> Government Agency Problems (Local thru Federal) | (G) <input type="checkbox"/> | Other Litigation (specify) | (Y) <input type="checkbox"/> |
| <input type="checkbox"/> Immigration/Naturalization | (M) <input checked="" type="checkbox"/> | Other Non-Litigation (specify) | (Z) <input type="checkbox"/> |
- N/A - he was/is a party to litigation

IS THE CASE HANDLED BY THE LAWYER STILL PENDING? YES NO

(This Section for Secretary's Use Only)

DOCKET NUMBER DATE DOCKETED

**** COMPLETE BOTH SIDES ****

D. OTHER RELATED COMPLAINTS OR LITIGATION:

- (1) Have you filed a complaint regarding this matter with law enforcement authorities or any other state or federal agency? ☒ YES ☐ NO If yes, please state:

Name of Agency: Plymouth Meeting Police Department

Contact Person: Andrew Moretti Date Filed: 12/22/2022

Result: I believe the investigation was never formally closed, so it is classified as pending.

- (2) Is the matter you are complaining about the subject of a pending civil law suit? ☒ YES ☐ NO
If yes, give name of Court Family Court for the State of Delaware

Docket Number: CN23-01005 County: New Castle County

E. NATURE OF GRIEVANCE:

State what the lawyer did or failed to do which may be unethical. State all relevant FACTS including dates, times, places and names and addresses of important witnesses. Attach copies of important letters and documents.

I am reaching out to follow up on a complaint I filed with the New Jersey Bar against Edwin Leon, Esq. (NJ Bar No. 397892022). Mr. Leon is currently, and has been for the last nine months, subject to a protection from abuse order in Delaware (an ex parte order, several interim orders, and a final order). These orders were issued pursuant to his abusive actions described in the attached opinion.

In particular, I would like to draw your attention to pages 43-49 and 52 of the opinion, which provide some insight into the unethical course of conduct Mr. Leon displayed during and in anticipation of this matter.

Certain acts of abuse Mr. Leon undertook were in furtherance of his scheme to fabricate evidence, witness tamper, and coerce false testimony (via affidavit). I believe these actions, combined with his astounding display of ethical depravity during the course of our litigation, warrant permanent disbarment.

I am happy to discuss this further and provide such further information as you may require for the

(Use Additional Sheets if Necessary)

F. INVESTIGATIVE CONFIDENTIALITY

The Supreme Court of New Jersey has held that persons who file grievances “may speak publicly regarding the fact that a grievance was filed, the content of that grievance, and the result of the process.” Since disciplinary officials are required by *Rule 1:20-9(h)* to maintain the confidentiality of the investigation process and may neither speak about the case nor release any documents, until and unless a formal complaint is issued and served, you must also keep confidential any documents you may receive during the course of the investigation of your grievance.

To protect the integrity of the investigation process, we recommend that you, as well as all witnesses, not speak about the case other than to disciplinary officials while the matter is under investigation. So long as you maintain the confidentiality of the investigation process, you have immunity from suit for anything you say or write to disciplinary officials. However, the Supreme Court has stated that you “are not immune for statements made outside the context of a disciplinary matter, such as to the media or in another public forum.” *R.M. v. Supreme Court of New Jersey*, 185 N.J. 208 (2005).

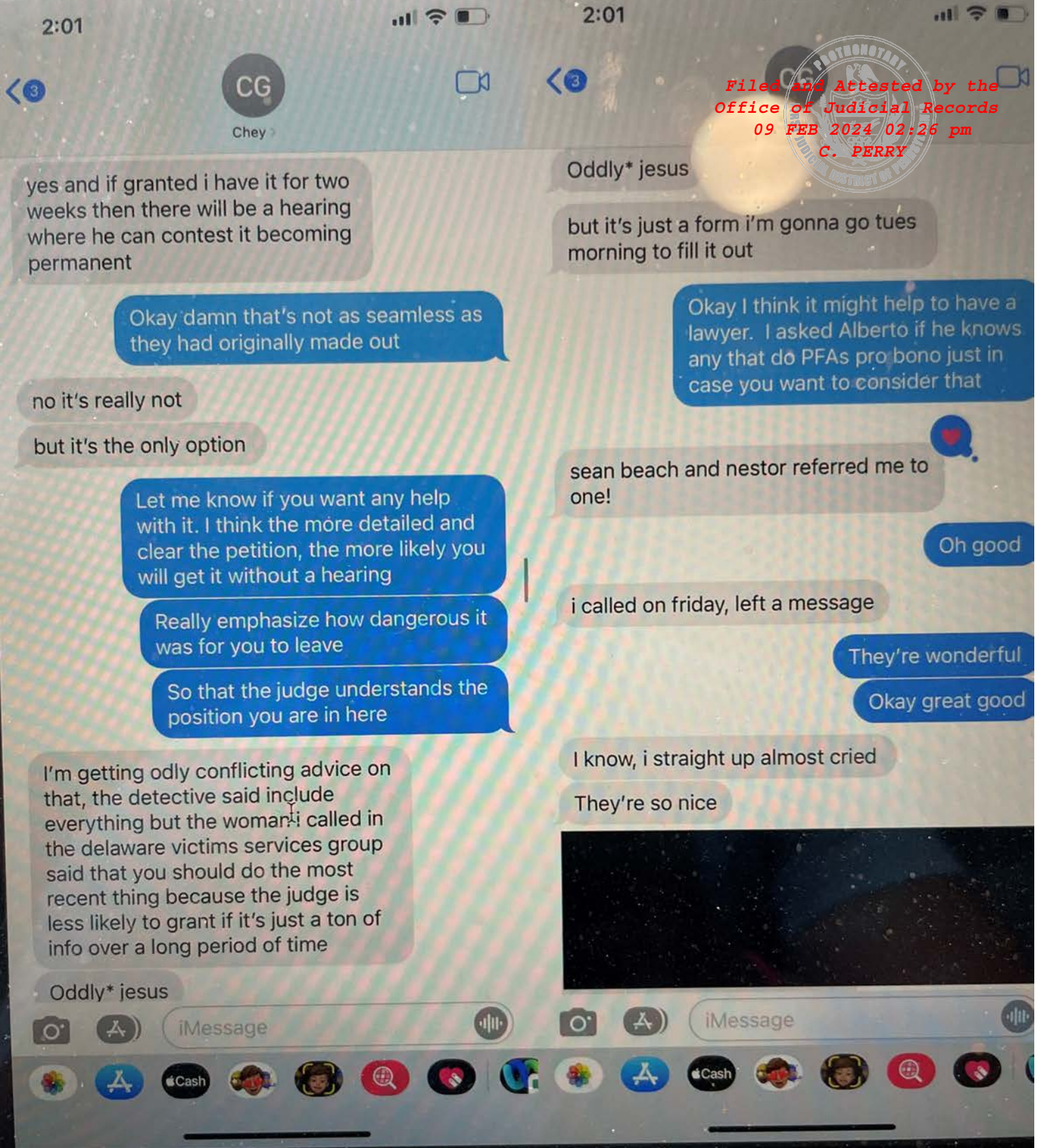
Date: 09/28/2023

s/ Cheyenne Goodman
Signature

PLEASE REVIEW THE PAMPHLET “INFORMATION ABOUT GRIEVANCE PROCEDURES AND DISCIPLINE OF LAWYERS” PROVIDED BY THE ETHICS SECRETARY.



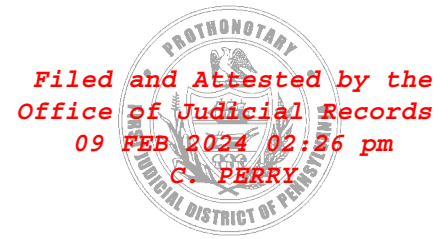
PLEASE NOTIFY DISTRICT SECRETARY OF DISABILITY ACCOMMODATION NEEDS.



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C. PERRY

PAX LEGAL, LLC

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 Plymouth Meeting, PA 19462
 (610) 940-1663 TEL
 neil@paxlegalllc.com
 lida@paxlegalllc.com



| | | |
|------------------|---|-------------------------------------|
| Edwin Leon, | : | |
| | : | IN THE COURT OF COMMON PLEAS |
| Plaintiff | : | PHILADELPHIA COUNTY |
| vs. | : | |
| | : | CIVIL DIVISION – LAW |
| Cheyenne Goodman | : | |
| and | : | |
| Nehama Hanoch | : | Case ID No. 230400452 |
| Defendants | : | |

CERTIFICATE OF SERVICE**TO THE PROTHONOTARY:**

I hereby certify that the Plaintiffs First Amended Complaint, Exhibits attached thereto and Notice to Defend is being served on all counsel of record by electronic mail on the 9th day of February 2024.

PAX LEGAL, LLC

BY: NEIL M. HILKERT, ESQUIRE
ATTORNEY FOR PLAINTIFF
Edwin Leon

DATED: February 9, 2024